

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
EASTERN DIVISION

NO. 4:20-CR-72-1M(4)
NO. 4:20-CR-72-2M(4)

UNITED STATES OF AMERICA)

v.)

ALEXIS BAEZ MORALES)
CIRCE NENA BAEZ)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

On or about July 24, 2019, in the Eastern District of North Carolina, the defendants, ALEXIS BAEZ MORALES and CIRCE NENA BAEZ, did knowingly and intentionally combine, conspire, confederate, agree and have a tacit understanding with each other, to commit an offense against the United States, that is, to take, by force, violence and intimidation, to take from the person and presence of another, approximately \$2,494.00 in United States Currency, belonging to and in the care, custody, control, management and possession of Southern Bank, located at 236 West 3rd Street, Ayden, North Carolina, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Sections 2113(a) and (d).

OBJECT OF CONSPIRACY

It was the object of the conspiracy for the defendants, ALEXIS BAEZ MORALES and CIRCE NENA BAEZ, to rob Southern Bank, located at 236 West 3rd Street, Ayden, North Carolina.

OVERT ACTS

In furtherance of the conspiracy and to effect the objective thereof, the defendants, ALEXIS BAEZ MORALES and CIRCE NENA BAEZ, committed or caused to be committed one or more of the following overt acts, among others:

- (1) On or about July 24, 2019, the defendants, ALEXIS BAEZ MORALES and CIRCE NENA BAEZ, traveled to the Southern Bank, located at 236 West 3rd Street, Ayden, North Carolina (hereinafter "Southern Bank").
- (2) On or about July 24, 2019, CIRCE NENA BAEZ, entered Southern Bank and produced a hand-written demand note to the bank teller and robbed Southern Bank of approximately \$2,494.00, after which CIRCE NENA BAEZ departed the bank and met ALEXIS BAEZ MORALES, who drove both defendants ~~away~~ ^{away} from the scene of the crime.

All in violation of the provisions of Title 18, United States Code, Section 371.

COUNT TWO

On or about July 24, 2019, in the Eastern District of North Carolina, the defendants, ALEXIS BAEZ MORALES and CIRCE NENA BAEZ, aiding and abetting one another, did, by force, violence and intimidation take from the person and presence of another, United States Currency, belonging to and in the care, custody,

control, management, and possession of Southern Bank, located at 236 West 3rd Street, Ayden, North Carolina, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Sections 2113(a) and 2.

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FORFEITURE NOTICE

Defendant is given notice that all of the defendant's interest in all property specified herein is subject to forfeiture.

Upon conviction of the offenses set forth in Count One and Count Two, the defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), as made applicable by Title 28, United States Code, Section 2461(c), any and all property constituting, or derived from, any proceeds the defendants obtained directly or indirectly as a result of the said offense. .

If any of the above-described forfeitable property, as a result of any act or omission of a defendant --

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

[Remainder of page intentionally left blank]

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

A TRUE BILL.


REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

~~FOREPERSON~~

7-28-20
DATE

ROBERT J. HIGDON, JR.
United States Attorney


By: BRYAN M. STEPHANY
Assistant United States Attorney
Criminal Division